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*Remarks of*

***Dr. Linette Branham, Education Issues Specialist  
Connecticut Education Association***

*Before the*

***Education Committee***

**Re: S.B. No. 1103 “An Act Concerning Early Childhood”  
and**

**S.B. No. 1105 “An Act Concerning Special Education”  
and**

**S.B. No. 1106 “An Act Concerning the Establishment of the  
Department of Early Education and Child Development**

*March 7, 2011*

Good afternoon Senator Stillman, Representative Fleischman, and members of the Education Committee. My name is Linette Branham, and I’m an education issues specialist with the Connecticut Education Association. I’m here today to comment on raised bills 1106, 1103, and 1105.

CEA supports the work described in raised bills 1106 and 1103, as all of this is needed as part of a comprehensive public education system. We believe the Department of Early Education and Child Development, and the Early Childhood Education Cabinet proposed in these bills, should reside within the State Department of Education. This would provide greater consistency in providing programs, and align with Governor Malloy’s wish to consolidate state agencies. However, as it is described in bill 1103, the Early Childhood Education Cabinet doesn’t include teacher representation, which we believe is essential. CEA has had a seat on other early childhood councils, and to assure that the voice of early childhood teachers is heard, requests that CEA be given a seat on any such council that is established.

Raised bill 1105 – An Act Concerning Special Education – expands the group of professionals who can provide applied behavior analysis services (ABA) to include special education teachers. This raises the following questions and concerns:

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1. The bill states this expanded group includes, *but is not limited to*, special educators. Who will determine which other professionals will be able to provide ABA services? Using such open-ended language opens the door to inconsistent practice, with the possibility of providers who are not fully qualified.
2. The certification regulations of current special educators – whether through the early childhood integrated certificate or the comprehensive special education certificate - don't specifically require ABA as part of the preparation program. Language in the regulations regarding the assessment of student behavior, and adapting the environment for children with special needs, is general. How can we be sure, then, that teachers currently certified through Connecticut preparation programs are well qualified to provide ABA services to students?
3. The proposed special education certification regulations, which wouldn't go into effect until July 2016, require study of applied behavior analysis in only two of the four special education preparation programs. The cross endorsement for teachers of severely disabled students is a 15-credit program covering six areas of study, one of which includes ABA. The proposed Special Education Intervention Specialist certificate, for which a teacher must be an experienced special education teacher, includes three areas of study, two of which include ABA. Special education preparation programs for a grades preK-12 special education teacher certificate, or for a certificate to teach mild to moderately disabled students, don't specifically require *any* preparation in ABA. Considering that current law requires that ABA service providers have at least nine credits of coursework approved by the Behavior Analyst Certification Board, how can parents be assured that these certificates will adequately prepare special educators?
4. The State Department of Education has stated in the past that as many as 50% of our special education teachers come from out of state. How can we be assured that *they* have appropriate training in providing applied behavior analysis services to students?

While we realize that some special education preparation programs require study in applied behavior analysis, not all do to the extent defined in current law. Until there are certification regulations in place that require all special educators to have study in ABA, no matter what special education certificate they hold, or whether they received their training in CT or another state, CEA believes it is in the best interest of children to avoid language such as that in raised bill 1105. Thank you.